

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LONG PLAYER LP,

Plaintiff,

-against-

GOLD MAIDEN LLC, UNITED TRISTAR LLC,  
JEREMY SOUSSAN, DAN VAHDAT, SOUVAH  
LLC, BLUEPRINT INDUSTRIES, LLC, and BLUE  
CITY MEDIA,

Defendants.

Case No. 18-CV-2414 (LGS)

**NOTICE OF CROSS-MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jeremy Soussan, dated March 27, 2018, the Declaration of Shahab Daniel (“Dan”) Vahdat, dated March 27, 2018, the exhibits submitted therewith, and upon the Memorandum of Law, dated March 27, 2018, and upon all prior papers and pleadings herein, Defendants Gold Maiden LLC, United Tristar LLC, Jeremy Soussan, Dan Vahdat, Souvah LLC, Blueprint Industries, LLC, and Blue City Media will cross-move this Court, before the Hon. Lorna G. Schofield, U.S.D.J., at the United States District Court for the Southern District of New York, at the Courthouse located at 40 Foley Square, Courtroom 1106, New York, NY 10007, on March 29, 2018 at 11:30 a.m., for an Order: (i) pursuant to F.R.C.P. 12(b)(1) dismissing this action for lack of subject matter jurisdiction; and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
March 27, 2018

**WACHTEL MISSRY LLP**

By: s/ Steven J. Cohen  
Steven J. Cohen  
David Yeger  
One Dag Hammarskjold Plaza  
885 Second Avenue, 47<sup>th</sup> Fl.  
New York, NY 10017  
(212) 909-9500  
cohen@wmlp.com  
dyeger@wmlp.com  
*Attorneys for Defendants*

To: Peter James Reid, Esq.  
Pete Reid Law, PLLC  
3901 South Lamar, Ste. 260  
Austin, TX 78704  
(512) 261-2500  
*Attorneys for Plaintiff*